

IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF ALABAMA

Courtney Boyd #200921  
Plaintiff

VS.

Case NO. 2:06-CV-511-ZWKZ

Dr. Darbouze, et al.  
Defendants

MOTION FOR Interrogatories For Good Cause Shown:  
Comes Now, the plaintiff, Courtney Boyd, moves into this  
Honorable Court please pursuant to Rule 28 & 33 Fed. R.  
Civ. Proc., And authority herein files and present, his interrog-  
atories direct at Defendants, Jean Darbouze, Kay Wilson,  
Cynthia Zumbles, Susanne Bush, who should answer  
these interrogatories under Oath within (25) days of  
receiving them. Their answer must be filed by Apr. 17, 2007.  
If there's a name or a number, then that person should  
only answer: Interrogatories

1. For each Defendant to list their full name & home address?
2. For each Defendant to list their age and Date of Birth?
3. For each Defendant to list how long they have been a resident  
of Alabama, and what County they live now?
4. How long have they been employed by Prison Health  
Service?
5. If they ever had a Serious Complaint or Grievance  
filed against you by any inmates. If so please produce  
a clear copy of every one of them?

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6. If any one of the Defendants is married and have children, listed how long you been married, and how old are your children?
7. Have any of you been arrested prior to your employment within the Prison Health Service. If so listed what the charge was, and when the charge happen?
8. Listed your complete educational background, that including any special classes you participated in? Produce each copy of the classes you all was in.
9. Dr. Darbouze Can x-ray read the soft tissue in the spinal cord if something was wrong with it? or Can x-ray only read broken bone?
10. MS. ZWILSON ~~was given~~ <sup>has</sup> Charge of all the nurses and Doctor?
11. MS. ZWILSON is it standard for an nurse to tell an inmate to sign up for sick call when his lower back and body goes out? Is it standard for an nurse to tell an inmate ~~that~~ there nothing with him, when he is brought up the on a stretcher?
12. MS. BUSH is it standard for an nurse to have an inmate who's lower back and body has gone out, and who was brought to the HCU on a stretcher, to have two inmate pick him up and place him in the waiting room?

Wherefore, The plaintiff Prays that the Defendants will answer these interrogatories by April 30, 2007.

## Certificate of Service

I hereby Certify that I have served a copy of the foregoing upon the Defendant's Counsel, by placing it into the Easterling Corr. Fac. Mail Box on April 6, 2007.

Cecily D. [Signature]

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-Cantney Boyd #208921 Sep 13-1-4

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U.S. District Court For Middle District

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2007

